

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

RODNEY OLIVER p/k/a RODNEY O, and NECOLE KEY,
Plaintiffs,

v.

BARRY WHITE FAMILY TRUST, SONY MUSIC ENTERTAINMENT d/b/a EPIC
RECORDS, UNIVERSAL MUSIC GROUP, LLC, ROB FINAN, DOROTHY M. WEBER,
NAYVADIUS WILBURN p/k/a FUTURE, LELAND WAYNE p/k/a METRO BOOMIN,
KENDRICK DUCKWORTH p/k/a KENDRICK LAMAR, and JOHN DOES 1–10,
Defendants.

Case No. 1:25-cv-03602-DLC

PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO SERVE SUMMONS AND
COMPLAINT

Plaintiffs Rodney Oliver p/k/a Rodney O and Necole Key, appearing *pro se*, respectfully move
this Honorable Court pursuant to Federal Rule of Civil Procedure 4(m) for a 60-day extension of
time to serve the summons and complaint on the remaining unserved Defendants.

GROUND FOR EXTENSION:

1. Plaintiffs filed the operative Complaint on April 29, 2025.
2. To date, Plaintiffs have successfully served the following Defendants:
 - Robert Finan (waiver filed)
 - Barry White Family Trust (served in both California and New York)

- Nayvadius Wilburn p/k/a Future (residence service)
 - Kendrick Duckworth p/k/a Kendrick Lamar (residence service with mail)
3. However, Plaintiffs have not yet completed service on the following high-profile and corporate Defendants:
- Leland Wayne p/k/a Metro Boomin
 - Sony Music Entertainment d/b/a Epic Records
 - Universal Music Group, LLC
 - Dorothy M. Weber
 - Jack Perry (in his individual capacity, if applicable)
 - John Does 1–10 (whose identities remain unknown)
4. The unserved Defendants include internationally known music artists, high-profile individuals, and large entertainment corporations, which has complicated service efforts due to privacy protections, corporate gatekeeping, and the need for process servers to coordinate with guarded facilities and business structures.
5. Plaintiffs have diligently attempted service, engaged professional process servers, and secured service on multiple parties despite these hurdles.
6. Plaintiffs respectfully request an additional 60 days, through September 26, 2025, to complete service on the remaining Defendants.

7. This request is made in good faith, is not for delay, and no party will be prejudiced by the requested extension.

RELIEF REQUESTED:

WHEREFORE, Plaintiffs respectfully request that this Court:

- Extend the deadline under Rule 4(m) by 60 days—to September 26, 2025—to complete service on the remaining Defendants;
- Grant such further relief as the Court deems just and proper.

Dated: July 30, 2025

Respectfully submitted,

/s/ Necole Key

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/s/ Rodney Oliver

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